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19  
20 **UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

21 CHASOM BROWN, WILLIAM BYATT,  
22 JEREMY DAVIS, CHRISTOPHER  
23 CASTILLO, and MONIQUE TRUJILLO  
24 individually and on behalf of all similarly  
situuated,

25 Plaintiffs,

26 vs.

27 GOOGLE LLC,

28 Defendant.

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Case No.: 5:20-cv-03664-YGR-SVK

**PLAINTIFFS' ADMINISTRATIVE  
MOTION TO CONSIDER WHETHER  
PORTIONS OF MOTION FOR LEAVE  
TO AMEND COMPLAINT SHOULD BE  
SEALED**

The Honorable Yvonne Gonzalez Rogers  
Courtroom 1 - 4th Floor  
Date: March 15, 2022  
Time: 2:00 p.m.

1 Pursuant to Civil Local Rule 79-5, Plaintiffs respectfully ask the Court to consider whether  
 2 Google LLC's ("Google") material should be sealed. The material is included within Plaintiffs'  
 3 Rule 15(a) Motion for Leave to File their Third Amended Complaint ("Plaintiffs' Motion").

4 Plaintiffs reserve their right to oppose Google's request to seal.

5 Document Sought to 6 be Sealed	7 Party Claiming 8 Confidentiality	9 Portions to be filed 10 under seal	11 Basis for Sealing 12 Portion of Document
13 Plaintiffs' Motion	14 Google	15 Portions highlighted in 16 yellow on Pages 3, 5, 17 6, 10, 11, 12, 13, 14, 18 15, 16, 17, 18, 19, 20, 19 21, 22, 23, 24, 25	20 Refers to material 21 designated 22 "Confidential" and 23 "Highly Confidential" 24 pursuant to the 25 Protective Order
26 Declaration of Mark 27 C. Mao in Support of 28 Plaintiffs' Motion for Leave to File their Third Amended Complaint ("Mao Decl.")	29 Google	30 Portions highlighted in 31 yellow within 32 paragraphs 6, 8, 9, 10	33 Refers to material 34 designated 35 "Confidential" and 36 "Highly Confidential" 37 pursuant to the 38 Protective Order
39 Exhibit 1 to Mao Decl.	40 Google	41 Entirety	42 Document designated 43 "Confidential" 44 pursuant to the 45 Protective Order
46 Exhibit 2 to Mao Decl.	47 Google	48 Entirety	49 Document designated 50 "Confidential" 51 pursuant to the 52 Protective Order
53 Exhibit 3 to Mao Decl.	54 Google	55 Entirety	56 Document designated 57 "Confidential" 58 pursuant to the 59 Protective Order
60 Exhibit 4 to Mao Decl.	61 Google	62 Entirety	63 Document designated 64 "Confidential" 65 pursuant to the 66 Protective Order
67 Exhibit 5 to Mao Decl.	68 Google	69 Entirety	70 Document designated 71 "Confidential" 72 pursuant to the 73 Protective Order
74 Exhibit 6 to Mao Decl.	75 Google	76 Entirety	77 Document designated 78 "Highly Confidential" 79 pursuant to the 80 Protective Order

1	Exhibit 7 to Mao Decl.	Google	Entirety	Document designated “Confidential” pursuant to the Protective Order
2	Exhibit 8 to Mao Decl.	Google	Entirety	Document designated “Confidential” pursuant to the Protective Order
3	Exhibit 9 to Mao Decl.	Google	Entirety	Document designated “Confidential” pursuant to the Protective Order
4	Exhibit 10 to Mao Decl.	Google	Entirety	Document designated “Highly Confidential” pursuant to the Protective Order
5	Exhibit 11 to Mao Decl.	Google	Entirety	Document designated “Confidential” pursuant to the Protective Order
6	Exhibit 12 to Mao Decl.	Google	Entirety	Document designated “Confidential” pursuant to the Protective Order
7	Exhibit 13 to Mao Decl.	Google	Entirety	Document designated “Highly Confidential” pursuant to the Protective Order
8	Exhibit 14 to Mao Decl.	Google	Entirety	Document designated “Confidential” pursuant to the Protective Order
9	Exhibit 15 to Mao Decl.	Google	Entirety	Document designated “Confidential” pursuant to the Protective Order
10	Exhibit 16 to Mao Decl.	Google	Entirety	Document designated “Confidential” pursuant to the Protective Order
11	Exhibit 17 to Mao Decl.	Google	Entirety	Document designated “Confidential” pursuant to the Protective Order
12	Exhibit 18 to Mao Decl.	Google	Entirety	Document designated “Confidential” pursuant to the Protective Order

1	Exhibit 19 to Mao Decl.	Google	Entirety	Document designated “Confidential” pursuant to the Protective Order
2	Exhibit 20 to Mao Decl.	Google	Entirety	Document designated “Confidential” pursuant to the Protective Order
3	Exhibit 21 to Mao Decl.	Google	Entirety	Document designated “Confidential” pursuant to the Protective Order
4	Exhibit 22 to Mao Decl.	Google	Entirety	Document designated “Confidential” pursuant to the Protective Order
5	Exhibit 23 to Mao Decl.	Google	Entirety	Document designated “Confidential” pursuant to the Protective Order
6	Exhibit 24 to Mao Decl.	Google	Entirety	Document designated “Highly Confidential” pursuant to the Protective Order
7	Exhibit 25 to Mao Decl.	Google	Entirety	Document designated “Highly Confidential” pursuant to the Protective Order
8	Exhibit 26 to Mao Decl.	Google	Entirety	Document designated “Confidential” pursuant to the Protective Order
9	Exhibit 27 to Mao Decl.	Google	Entirety	Document designated “Confidential” pursuant to the Protective Order
10	Exhibit 28 to Mao Decl.	Google	Entirety	Document designated “Highly Confidential” pursuant to the Protective Order
11	Exhibit 29 to Mao Decl.	Google	Entirety	Document designated “Confidential” pursuant to the Protective Order
12	Exhibit 30 to Mao Decl.	Google	Entirety	Document designated “Highly Confidential” pursuant to the Protective Order

1	Exhibit 31 to Mao Decl.	Google	Entirety	Document designated “Highly Confidential” pursuant to the Protective Order
2	Exhibit 32 to Mao Decl.	Google	Entirety	Transcript designated “Confidential” pursuant to the Protective Order
3	Exhibit 33 to Mao Decl.	Google	Entirety	Transcript designated “Confidential” pursuant to the Protective Order
4	Exhibit 34 to Mao Decl.	Google	Entirety	Document designated “Confidential” pursuant to the Protective Order
5	Exhibit 35 to Mao Decl.	Google	Entirety	Document designated “Highly Confidential” pursuant to the Protective Order
6	Exhibit 36 to Mao Decl.	Google	Entirety	Document designated “Highly Confidential” pursuant to the Protective Order
7	Exhibit 37 to Mao Decl.	Google	Entirety	Document designated “Highly Confidential” pursuant to the Protective Order
8	Exhibit 38 to Mao Decl.	Google	Entirety	Document designated “Highly Confidential” pursuant to the Protective Order
9	Exhibit 39 to Mao Decl.	Google	Entirety	Document designated “Highly Confidential” pursuant to the Protective Order
10	Exhibit 40 to Mao Decl.	Google	Entirety	Document designated “Confidential” pursuant to the Protective Order
11	Exhibit 41 to Mao Decl.	Google	Entirety	Document designated “Highly Confidential” pursuant to the Protective Order
12	Exhibit 42 to Mao Decl.	Google	Entirety	Document designated “Confidential” pursuant to the Protective Order
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1	Exhibit 43 to Mao Decl.	Google	Entirety	Interrogatory Response designated “Highly Confidential” pursuant to the Protective Order
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5 Pursuant to Civil Local Rule 79-5(f), Google, as the Designating Party, bears the  
6 responsibility to establish that its designated material is sealable.

7 Dated: February 3, 2022

8 Respectfully submitted,

9 By: /s/Amanda Bonn

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